

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 2:16cr97
)	
MARQUE WILSON,)	
a/k/a "Quis,")	
)	
Defendant.)	

STATEMENT OF FACTS

By signing below, the parties and their respective counsel agree that if this case had gone to trial, the government's evidence would have established the following facts beyond a reasonable doubt:

1. From in or about March 2012 to in or about July 2016, the defendant, MARQUE WILSON, was a member of a drug trafficking conspiracy that primarily operated in Portsmouth and Chesapeake, Virginia. The defendant entered into a conspiracy with other individuals to purchase, manufacture, distribute, and possess with intent to distribute any amount of heroin in the Eastern District of Virginia and elsewhere.

2. On or about October 21, 2015, in Portsmouth, Virginia, the defendant sold approximately two grams of heroin for an amount of United States currency. After the controlled purchase of heroin, law enforcement officers arrested the defendant and he had in his possession ten grams of heroin for the purpose of resale.

3. From on or about March 2016 to in or about June 2016, the defendant purchased heroin and other substances from co-conspirator NATHANIEL POWELL.

MJW
HMH
JTB

4. From on or about March 2016 to in or about June 2016, the defendant sold heroin to co-conspirator, VALERIE WILSON, who then transported heroin to individuals in North Carolina.

5. On or about June 10, 2016, in Portsmouth, Virginia, the defendant led police on a vehicle pursuit while in possession of approximately two grams of heroin and an amount of cocaine.

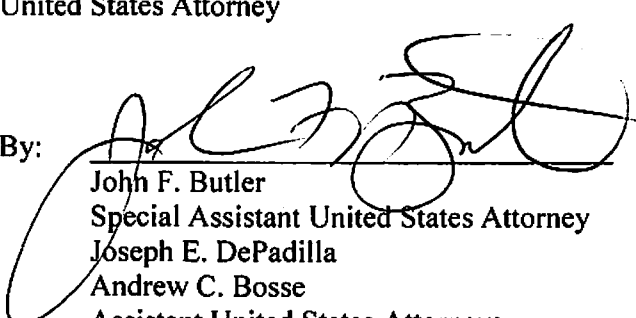
6. On or about June 15, 2016, the defendant possessed approximately eight grams of crack cocaine and approximately six grams of fentanyl.

7. The acts taken by the defendant in furtherance of the offenses charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case, nor does it identify all of the persons with whom the defendant may have engaged in illegal activities. The defendant further acknowledges that he is obligated under his plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

Respectfully submitted,

Dana J. Boente
United States Attorney

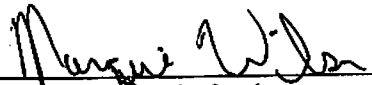
By:



John F. Butler
Special Assistant United States Attorney
Joseph E. DePadilla
Andrew C. Bosse
Assistant United States Attorneys

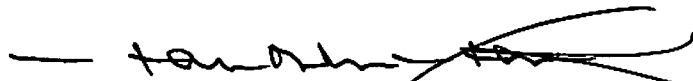
MSW
HSH
JTB

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Marque Wilson, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Marque Wilson, Defendant

I am the attorney for defendant, Marque Wilson. I have carefully reviewed the above Statement of Facts with him. His decision to enter into this factual stipulation is knowing, intelligent, and voluntary.



Harry Harmon, Jr., Esq.
Defense Counsel

M.W.
H.H.
JB